

Exhibit D

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2
3 COUNTY OF ALAMEDA

4 ---000---
5
6 MARLIN LEWIS EAGLES and
7 GEORGIA EAGLES,
8 Plaintiffs,
9
10 vs.
11 ARVINMERITOR, INC., et
12 al.,
13 Defendants.
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15 _____ /
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No. 22CV018294

VIDEOTAPED ZOOM DEPOSITION OF WILLIAM LONGO, Ph.D.
VOLUME 3, Pages 282 - 507
November 3, 2023

REPORTED BY:

EARLY K. Langley RMR, RSA, B.A.

CSR NO. 3537

JOB NO: 6298688

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1 DEPOSITION OF WILLIAM LONGO, Ph.D.
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3 BE IT REMEMBERED, that pursuant to Notice, and
4 on November 3, 2023, commencing at the hour of
5 8:10 a.m. Pacific Time, before me, EARLY Langley, a
6 Certified Shorthand Reporter, State of California, via
7 Zoom appeared WILLIAM LONGO, Ph.D., produced as a
8 witness in said action, and being by me previously duly
9 sworn, was thereupon examined as a witness in said
10 cause.

11 -----
12 APPEARANCES:

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14 For the Plaintiffs:
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11 on behalf of Longs Drug Stores California, Inc.; Lucky
12 Stores (Save Mart) LLC f/k/a Lucky Stores, Inc.; and
13 Safeway Inc:

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21
22 ALSO PRESENT:

23
24 Geoff Minger, Videographer

1 at least two orders of magnitude higher.

2 Q. And so that -- that opinion would apply to
3 any cosmetic talc sold by any retailer, large or
4 small, in the United States at any point in time;
5 correct? 12:53

6 A. Yes. But just to make it careful, it's
7 the -- I'm not aware of any other mines than I've
8 already stated in the United States and I'm not
9 aware of any other mines for cosmetic talcs in
10 Europe or Asia such as Chinese, such as Italian, 12:53
11 such as France, such as Brazil, and such as India.

12 Q. But North America, you're -- are you
13 confident in saying that there's asbestos in every
14 bottle of cosmetic talc that was sold at any time
15 in North America? 12:54

16 A. Any bottle that was sold in North America
17 that used a mine source for cosmetic talc in North
18 America will have some level of asbestos in it,
19 and it just depends on the detection limit is --
20 if we can find it or not. So it's all about 12:54
21 detection limits.

22 Q. Okay. But let me take that a little bit
23 further.

24 Do you have an opinion as to what
25 percentage of that talc is at a detection limit 12:55

1 STATE OF CALIFORNIA

2 ss.

3 REPORTER'S CERTIFICATE

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5

6 I, EARLY Langley, a Certified Shorthand
7 Reporter, State of California, do hereby certify:

8 That WILLIAM LONGO, Ph.D., in the foregoing
9 deposition named, was present via Zoom and by me
10 sworn as a witness in the above-entitled action at
11 the time and place therein specified;

12 That said deposition was taken before me
13 via Zoom at said time and place, and was taken
14 down in shorthand by me, a Certified Shorthand
15 Reporter of the State of California, and was
16 thereafter transcribed into typewriting, and that
17 the foregoing transcript constitutes a full, true
18 and correct report of said deposition and of the
19 proceedings that took place;

20 IN WITNESS WHEREOF, I have hereunder subscribed my
21 hand on November 6, 2023.

22 

23 EARLY Langley, CSR NO. 3537

24 State of California